

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ORIGINAL

UNITED STATES OF AMERICA : INDICTMENT  
- v. - : S1 14 Cr. 309 (SAS)

PARVEZ MUNSHI, : (SFC SDNY  
Defendant. : DOCUMENT  
- - - - - x ELECTRONICAL  
COUNT ONE DOC #: \_\_\_\_\_  
(Conspiracy to Commit Bank Fraud) DATE FILED: SEP

1. From at least in or about June 2013, up to and including in or about December 2013, in the Southern District of New York and elsewhere, PARVEZ MUNSHI, the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit bank fraud in violation of Title 18, United States Code, Section 1344, to wit, MUNSHI and others agreed to submit fraudulent loan applications to banks using false information and documents, including fake tax returns, in order to trick the banks into extending loans.

2. It was a part and an object of the conspiracy  
that PARVEZ MUNSHI, the defendant, and others known and unknown,  
willfully and knowingly would and did execute and attempt to  
execute a scheme and artifice to defraud financial institutions,  
the deposits of which were then insured by the Federal Deposit

Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institutions, by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344.

OVERT ACT

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt act, among others, was committed in the Southern District of New York and elsewhere:

a. On or about October 10, 2013, in New York, New York, PARVEZ MUNSHI, the defendant, signed and helped complete fraudulent loan applications.

(Title 18, United States Code, Section 1349.)

COUNT TWO  
(Bank Fraud)

4. In or about October 2013, in the Southern District of New York and elsewhere, PARVEZ MUNSHI, the defendant, willfully and knowingly executed and attempted to execute a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, to wit, Sovereign Bank, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of,

such financial institution, by means of false and fraudulent pretenses, representations, and promises, to wit, MUNSHI attempted to submit a false and fraudulent loan application.

(Title 18, United States Code, Sections 1344 and 2.)

**COUNT THREE**  
(Bank Fraud)

5. In or about October 2013, in the Southern District of New York and elsewhere, PARVEZ MUNSHI, the defendant, willfully and knowingly executed and attempted to execute a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, to wit, Wells Fargo Bank, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institution, by means of false and fraudulent pretenses, representations, and promises, to wit, MUNSHI attempted to submit a false and fraudulent loan application.

(Title 18, United States Code, Sections 1344 and 2.)

**FORFEITURE ALLEGATION**

6. As a result of committing the offenses alleged in Counts One, Two, and Three of the Indictment, PARVEZ MUNSHI, the defendant, shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(2)(A), any property constituting, or derived from, proceeds obtained directly or indirectly as a result of

the offenses, including but not limited to, a sum of money representing the amount of proceeds obtained as a result of said offenses.

Substitute Asset Provision

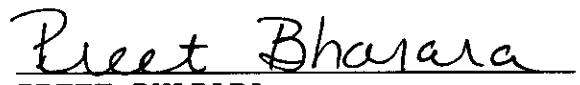
7. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b) and Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 982; Title 21, United States Code, Section 853.)

  
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FOREPERSON

  
Preet Bharara  
PREET BHARARA  
United States Attorney

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

PARVEZ MUNSHI,

Defendant.

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SUPERSEDING  
INDICTMENT

SI 14 Cr. 309 (SAS)

(18 U.S.C. §§ 1349, 1344 and 2.)

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PREET BHARARA  
United States Attorney.

A TRUE BILL

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Foreperson.

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9/23/14 - Filed Superseding Indictment.



Jeddy Fox  
USMNY